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CYTEC

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April 13, 2004

The Honorable Mike Leavitt, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

REFERENCE: Chemical Right-to-Know Program

Dear Sir/Madam:

Cytec Industries Inc. is pleased to respond to the EPA comments on the robust summaries and test plan for tris (4-t-butyl-3-hydroxy-2,6-dimethylbenzyl)-s-triazine-2,4,6-(1*H*,3*H*,5*H*)-trione (CAS No. 40601-76-1) as posted on the Chemical RTK HPV Challenge Program website.

Specific items of the response to the EPA are as follows:

- Physiochemical Properties: Testing for water solubility will be underway shortly. The Environmental Protection Agency and the sponsor agree that if results of the planned water solubility test indicate that the material is soluble in water, an algal toxicity test will be performed.

- Ecological Effects: Language indicating that an algal toxicity test may be conducted pending the results of the water solubility test has been added to the test plan.

- Health Effects (Repeat Dose): The 30-day study has been flagged as the critical study in the IUCLID document and a paragraph about the results of this study has been written into the test plan. The NOAEL and LOAEL have been changed to 1% and 2%, respectively. The doses in mg/kg/day have been added to both documents. The critical flags in the IUCLID document have been removed from the 90-day summaries and any text suggesting that these studies were the critical studies has been removed from the test plan.

- Health Effects (Reproductive/Developmental Toxicity): The EPA has pointed out that the evaluation of the reproductive organs (histopathology) from the 90-day studies is insufficient to address reproductive toxicity. The Agency reached that conclusion because the studies failed to include an adverse effect level, and the highest tested doses were significantly below the OECD guideline recommended limit dose of 1000 mg/kg/day. Any language which suggests that this study was a critical study and/or filled the endpoint has been removed from the IUCLID document and test plan. Language indicating that the endpoint will be filled by the planned OECD Test Guideline 421 study has been added to the test plan. The planned route of administration (dietary) is now specified.

Additional items:

- Synonyms: Some incorrect synonyms were listed in the test plan and robust summary document. This was pointed out by the PCRM in their comments. All incorrect synonyms have been corrected.

- Additional Reference: A reference supporting the lack of migration of CYANOX 1790 from the polymers in which it is used has been added to the test plan. This reference was provided by the EDF in their comments.

We are pleased to work cooperatively with the Agency and other interested parties to complete the screening needs for this substance under the Chemical RTK HPV Challenge Program.

Sincerely,

Randy Deskin, Ph.D., DABT
Director, Toxicology & Product Regulatory Compliance